1 Leslie A. Bailey (SBN 232690) lbailey@publicjustice.net Jennifer D. Bennett (SBN 296726) jbennett@publicjustice.net Public Justice, P.C. 4 555 12th Street, Suite 1230 5 Oakland, CA 94607 Phone: (510) 622-8150 6 Fax: (510) 622-8155 7 8 Attorneys for Intervenor Center for Auto Safety 10 UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA 11 12 PETER VELASCO, et al., Case No. 2:13-cv-08080-DDP (VBKx) 13 Plaintiffs, NOTICE OF MOTION TO UNSEAL 14 15 Date: December 1, 2014 v. Time: 10:00 a.m. 16 Judge: Honorable Dean D. Pregerson CHRYSLER GROUP LLC, 17 Courtroom: 3 Defendant. 18 19 20 The Center for Auto Safety ("the Center"), by and through counsel, hereby 21 22 moves this Court to unseal the sealed court records in Velasco v. Chrysler. The 23 Center's grounds for this Motion are set forth in the accompanying memorandum 24 in support thereof. Pursuant to L.R. 7-3, this motion is made following 25 26 conferences with plaintiffs' counsel on October 1, 2014 and with defendant's 27 counsel on October 16, 2014. The plaintiffs do not oppose this motion. 28

Dated this 23<sup>rd</sup> of October, 2014 /s/ Leslie A. Bailey Leslie A. Bailey Leslie A. Bailey Jennifer D. Bennett Public Justice, P.C. 555 12th Street, Suite 1230 Oakland, CA 94607 Phone: (510) 622-8150 Fax: (510) 622-8155 lbailey@publicjustice.net jbennett@publicjustice.net Attorneys for Intervenor The Center for Auto Safety